UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DOUBLELINE CAPITAL LP; DOUBLELINE INCOME SOLUTIONS FUND; and DOUBLELINE FUNDS TRUST (on behalf of its: 1) DOUBLELINE CORE FIXED INCOME FUND SERIES; 2) DOUBLELINE EMERGING MARKETS FIXED INCOME FUND SERIES; and 3) DOUBLELINE SHILLER ENHANCED CAPE® SERIES),

Case No. 1:17-cv-4576-GHW

Plaintiffs,

v.

CONSTRUTORA NORBERTO ODEBRECHT, S.A.; ODEBRECHT ENGENHARIA E CONSTRUÇÃO S.A. and ODEBRECHT, S.A.,

Defendants.

MEMO IN SUPPORT OF MOTION FOR WITHDRAWAL AS COUNSEL OF RECORD

Pursuant to Local Civil Rule 1.4, the undersigned respectfully requests the withdrawal of Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel") as counsel of record for Defendants Construtora Norberto Odebrecht ("CNO"), Odebrecht Engenharia e Construção ("OEC"), and Odebrecht S.A. ("OSA"), and that Michael B. Carlinsky, Eric C. Lyttle, Michael E. Liftik, and Jacob J. Waldman be withdrawn as counsel of record for CNO, OEC, and OSA. Because Victor L. Hou, Luke A. Barefoot, and Thomas S. Kessler of Cleary Gottlieb Steen & Hamilton LLP have appeared on behalf of CNO, OEC, and OSA, the Defendants will suffer no prejudice from the withdrawal of Quinn Emanuel.

CNO, OEC, and OSA, as well as Plaintiffs, consent to the relief requested in this motion.

DATED: New York, New York December 20, 2019 Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Michael B. Carlinsky
Michael B. Carlinsky
Jacob J. Waldman
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100
michaelcarlinsky@quinnemanuel.com
jacobwaldman@quinnemanuel.com

--and--

Michael E. Liftik (pro hac vice) Eric C. Lyttle (pro hac vice) 1300 I Street, Suite 900 Washington, D.C. 20005 Telephone: (202) 538-8000 michaelliftik@quinnemanuel.com ericlyttle@quinnemanuel.com